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August 5, 2005

Via Facsimile

Kathleen J. Hill, Esq.
Law Office of Kathleen J. Hill
92 State Street, Suite 700
Boston, MA 02109

Re: Griffith v. OneBeacon Insurance Company, et. al.

Dear Kathleen:

I write in response to your letter dated August 5, 2005 regarding receipt of Bates stamped documents.

On June 9, 2005, I wrote to you explaining that I had documents responsive to Plaintiff's Requests ready for production, but could not produce those documents until a confidentiality agreement was in place. With the June 9, 2005 letter, I included a draft of Defendants' proposed Confidentiality Agreement for your review.

When you failed to respond to the June 9, 2005 letter, I wrote on July 1, 2005, again indicating that responsive documents had long been ready for production upon the execution of a reasonable confidentiality agreement. As I did on June 9, I included a draft of Defendants' proposed confidentiality agreement. Again, there was no response.


In accompaniment of this letter, I have, for the third time, included a draft of Defendants' proposed Confidentiality Agreement for your review. Should you have changes to the language, please simply indicate them on the draft agreement and return them to me. I cannot provide you with responsive documents until we come to an agreement on the language of the Confidentiality Agreement.

MORGAN, BROWN & JOY LLP

Kathleen J. Hill, Esq.
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Please let me know your position regarding the Confidentiality Agreement as soon as possible so that we may serve you.

Regards,



Leah M. Moore

enclosure

cc: Joan K. Geddes, Esq. (via first class mail)
Keith B. Muntyan, Esq.